REMARKS

Applicants reply to the Final Office Action dated September 20, 2006 within two months. Thus, Applicants request an Advisory Action, if necessary. Claims 1-3, 5-15, 17-22, 24-26, 28, 30, and 32 were pending in the application and the Examiner rejects claims 1-3, 5-15, 17-22, 24-26, 28, 30, and 32. The Examiner inadvertently listed claim 6 as cancelled; however, Applicants assert that claim 6 was not cancelled in this Reply or any previous Reply. Reconsideration of this application is respectfully requested.

Rejection under 35 U.S.C. § 112

The Examiner rejects claims 1, 8, 13, and 20 under 35 U.S.C. § 112, first paragraph, as failing to comply with the written description requirement. Specifically, the Examiner asserts that the claims, "contain subject matter which was not described in the specification in such a way as to reasonably convey to one skilled in the relevant art that the inventor(s), at the time the application was filed, had possession of the claimed invention" (page 2, item 3). Applicants respectfully traverse this rejection.

The originally filed specification for the instant application clearly teaches a destination expert utility at a destination expert server that tracks and stores information specific to customer requests. The specification discloses that such information may be used to monitor the function and usage of the destination expert server. Further, the specification discloses that function and usage data can be used to tailor advertisements to be displayed in the customer's Graphical User Interface (GUI) in light of the destinations most frequently requested. Specifically, the supporting disclosure may be found on, for example, page 12, lines 17-27 of the originally filed specification, which reads as follows:

> More specifically, located within the storage device 76 is a destination expert utility 77, which monitors the function of the destination expert server 25. The destination expert utility 77 can track and store the number of customer requests received, the number of customer requests answered, the average time to respond to customer requests, and additional information which may be useful to a destination expert server administrator in monitoring the function and usage of the destination expert server 25 and system 8. For instance, the destination expert utility can determine the destination city to which the most customer requests are forwarded. This information may be used by the destination expert server 25 or an administrator of the server to tailor advertisements placed on the GUI, or to administer the system, such as identifying the need for additional experts in a specific city. (emphasis added)

Those of ordinary skill in the art would appreciate that the "city to which the most customer requests are forwarded," is synonymous with the "most frequently requested destination," as disclosed by the amended independent claims. Furthermore, those of ordinary skill in the art would appreciate that the disclosure of a server to "tailor advertisements" is synonymous with the claim limitation; "select an offer," as it is known that an advertisement is an offer.

The Examiner rejects claims 1, 8, 13, and 20 under 35 U.S.C. § 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which Applicant regards as the invention. Specifically, the Examiner asserts that the newly added element in the claims, "does not adequately describe how the offer data is determined, and whether it is based off user viewing habits (most frequently requested destination) or off stored answer information" (page 3, item 7). Applicants respectfully traverse this rejection.

As discussed above, the claims and the specification provide clear and specific support for selecting an offer (advertisement) based on determination of the most frequently requested destination (city to which the most customer requests are forwarded). The specification provides full disclosure of what constitutes a "request" and how the request is forwarded to and processed by destination cities.

Rejection under 35 U.S.C. § 103(a)

The Examiner rejects claims 1-26, 28, 30 and 32 under 35 U.S.C. § 103(a) as being unpatentable over Taufique, WO 01/20518 A1 ("Taufique") in view of Lauffer, U.S. Patent No. 6,223,165 B1 ("Lauffer") in view of Gerace, U.S. Patent No. 5,991,735 ("Gerace"), and in further view of DeLorme et al., U.S. Patent No. 5,948,040 ("DeLorme"). Applicants respectfully traverse this rejection.

Taufique generally discloses a system for providing communication between experts and end users over a network. Taufique teaches a system including a database where experts and expert credentials may be stored. An end user interfacing with the system may enter a question which is then used to search the database in order to identify an expert possessing expertise relating to the question. The Taufique system then routes the question to the identified expert, and when answered, the question and answer are stored in a database. A different end user subsequently submitting a similar question would then be issued a previously-stored answer from the database, thereby bypassing the step of transmitting the question to the expert to again answer the question.

Taufique is limited to a unique configuration of a "help" utility as is frequently employed in current web sites. Many product web sites offer their customers several options for obtaining help which may include, for example, a frequently asked questions web page, a knowledge base and a live help link. A frequently asked questions (FAQ) web page is usually compiled from a database of previously asked and answered questions, which usually requires an end user to review a list of questions to find one similar to their own. A knowledge base is very similar to a FAQ, although it usually requires the end-user to enter a specific question which is used to automatically conduct a database search for similar questions which have been previously answered.

Lauffer is limited to a system for delivering advice to consumers via a server unit that stores and displays the names and characteristics of experts, and then assists in connecting the expert and consumer for real-time communication. The server unit also has the ability to receive keywords from the consumer, match those keywords to one or more experts, and then tell the consumer how to contact an expert. The Lauffer system also includes a visual display of available experts that may be presented to consumers (col. 6, line 30 - col. 7, line 67). In addition, Lauffer teaches having the consumer compensate the expert, either directly or indirectly (col. 8, lines 1-53). Significantly, in all embodiments disclosed by Lauffer, the consumer and expert establish a connection, wherein the consumer and expert communicate interactively with each other (e.g., see col. 8, line 56 - col. 9, line 22).

DeLorme discloses a new Travel Reservations and Information System (TRIPS) that allows users to design a travel itinerary that is compiled based on a series of questions presented to the user. Specifically, the DeLorme system provides an interface, whereby a series of travel-related questions are presented to, and then answered by, the user. The questions include, for example, when, where, what to do, who to visit, and how to get there. The answers to the questions are then used by the DeLorme system to construct an itinerary, and then shop the itinerary to various providers of travel services such as hotels, airlines, and car rentals. After obtaining a number of quotes for the required travel services, the quotes are presented to the user who may compare the quotes side-by-side. DeLorme further discloses a TRIPS system that can make reservations based on a selected itinerary, print airline tickets, theatre tickets, rental vouchers, maps, and the like.

Taufique and Lauffer disclose systems for providing general advice, while DeLorme is directed toward a system for providing a custom itinerary based on a series of questions and answers thereof. Each reference generally discloses a fee assessment for provided advice and itinerary services. However, those skilled in the art would appreciate that advertising is the leading

Internet revenue generator, which continues to increase quarterly. For example, Internet revenue for the first quarter of 2006 exceeded $3.5 billion, which represents a six percent increase over the fourth quarter of 2005. Significantly, neither of the references discloses using the information stored in the variously disclosed advice databases to selectively target marketing offers to consumers. As such, neither Taufique, Lauffer, DeLorme, nor any combination thereof, disclose or suggest a destination expert server configured to at least, "compile offer data regarding the most frequently requested destination based on information stored in an answer database, wherein the offer data is used to select an offer relevant to the offer data," as similarly recited by amended independent claims 1, 8, 13 and 20.

The Examiner correctly notes that Taufique and Lauffer, "fail to expressly disclose compiling offer data regarding the most frequently requested destination based on information stored in the answer database, wherein the offer data is used to select an offer relevant to the offer data" (page 5, item 16). However, the Examiner asserts that Gerace "discloses providing target advertisements to users based on user psychographic profile information (internet viewing habits)" (page 6, item 17). Applicants respectfully disagree.

Gerace generally discloses a system for tracking user behaviors on the Internet in order to more accurately target marketing campaigns. Specifically, the Gerace system provides targeting of an advertising audience based on psychographic and/or behavioral profiles relating to Internet users. The Gerace system constructs a psychographic profile by recording computer activity and viewing habits of the user. Using the profile, with or without additional user demographics, advertisements are displayed to appropriately selected users. Through a process of regression analysis of recorded responses of users viewing the advertisements, the target user profile is refined over a period of time to progressively provide more precise targeting.

In order for the Gerace system to provide this level of targeted advertising, the system must collect and store information that is specific to each individual user. Gerace stores information regarding an identified user's psychographic and/or behavioral profiles within a user profile. This user profile is then used by the system to individually target advertisements to specific users. Improtantly, the Gerace system requires the user to initiate a relationship with the system and then provide personal information (*see*, column 4, lines 29-57). Thus, Internet users who have not registered with the Gerace system and provide the necessary personal information are outside of the reach of the Internet use monitoring and targeted advertising features taught by Gerace. This is a significant limitation in that there is a growing population of Internet users who are concerned over

Internet privacy, and the prospect of providing personal information to the advantage of advertisers, and to further agree to have their Internet usage monitored, would likely be widely rejected. The Gerace system is unable to provide targeted advertising based on the culmination of data to users, whether or not they have used a particular Internet service. As such, Gerace does not disclose or suggest a destination expert server configured to at least, "compile offer data regarding the most frequently requested destination based on information stored in an answer database, wherein the offer data is used to select an offer relevant to the offer data," as similarly recited by amended independent claims 1, 8, 13 and 20. Accordingly, neither Taufique, Lauffer, DeLorme, Gerace, nor any combination thereof, disclose or suggest a destination expert server configured to at least, "compile offer data regarding the most frequently requested destination based on information stored in an answer database, wherein the offer data is used to select an offer relevant to the offer data," as similarly recited by amended independent claims 1, 8, 13 and 20.

Dependent claims 2, 3, 5-7, 9-12, 14, 15, 17-19, 21, 22, 24-26, 28, 30 and 32 variously depend from independent claims 1, 8, 13 and 20. As such, dependent claims 2, 3, 5-7, 9-12, 14, 15, 17-19, 21, 22, 24-26, 28, 30 and 32 are allowable for at least the reasons described above with respect to independent claims 1, 8, 13 and 20, as well as in view of their own respective features.

Applicants respectfully submit that the pending claims are in condition for allowance. No new matter is added in this Reply. Reconsideration of the application is thus requested. The Commissioner is hereby authorized to charge any fees which may be required, or credit any overpayment, to Deposit Account No. 19-2814. Applicants invite the Examiner to telephone the undersigned, if the Examiner has any questions regarding this Reply or the present application in general.

Respectfully submitted,

Dated: November 17, 2006 By: _____

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